



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 3 2002

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Betty Berry, Chief
ENSV/ARCM

TO: Diane Huffman, Chief
ARTD/RESP

This memorandum transmits the following inspection report conducted by the Environmental Services Division:

FACILITY: Philip Morris	INSPECTION DATE: 06/20/2002	INSPECTION TYPE: CEI
ADDRESS: 4460 112th Street S	INSPECTOR: BAH	ID NUMBER: IAR000006858
	SIC CODE:	ACTIVITY NUMBER:
	FACILITY ACTIVITY: IA LQG	

Urbandale
IA 50322

PRELIMINARY INSPECTION FINDINGS: NOV/NOPF ISSUED - No SNC - No



R00401494

RCRA RECORDS CENTER

COMMENTS: No longer an active site.

MULTIMEDIA: 1) Screening done - No Screening forwarded - No Forwarded to: ☐CAA
☐CWA ☐RCRA ☐E/T ☐UST ☐CFC ☐Wetlands ☐SPCC ☐UIC ☐EJ ☐PWS ☐All

2) Inspection was part of a multimedia inspection with the following participating programs* -

* A=CAA, W=CWA, R=RCRA, T/E=TSCA/EPCRA, U=UST, C=CFC, U-I=UIC, S=SPCC, Wet.=Wetland, All

ENVIRONMENTAL JUSTICE: Inspection was conducted in EJ (per MM Screening Checklist) - No

SMALL BUSINESS REGULATORY ENFORCEMENT ACT (SBREFA): Information provided - Yes

Attachments

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

PHILLIP MORRIS USA c/o CENTROBE INC.

4460 112th Street
Urbandale, IA 50322

EPA RCRA ID No. IAR000006858

ON

June 20, 2002

BY

Booz Allen Hamilton

FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region 7

Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division (ENSV) and the Air, RCRA, and Toxics Division (ARTD) of the U.S. Environmental Protection Agency (EPA) Region 7, Booz Allen Hamilton (Booz Allen) conducted a RCRA Compliance Evaluation Inspection (CEI) on June 20, 2002 at the Phillip Morris USA c/o Centrobe, Inc. facility in Urbandale, Iowa. The inspection was conducted under the authority of Section 3007 (a) of the Resource Conservation and Recovery Act (RCRA), as amended. A full CEI specific to the facility's RCRA status as a large quantity generator (LQG) of hazardous waste was to be conducted. The purpose of the inspection was to gather information and data necessary for EPA to determine compliance with the applicable regulatory and statutory requirements. This inspection report and attachments present the findings of the inspection.

INSPECTION PROCEDURE

Prior to conducting the inspection, a review of the EPA files concerning this site was performed. It was discovered that on its last EPA Notification of Regulated Waste Activity, Mr. Brian Kiernen, Manager of Environmental Regulations and Permits for the Phillip Morris USA company, claimed that Phillip Morris USA had vacated the Urbandale site and had closed its operations there effective October 15, 2001 (Attachment 2). A letter dated October 16, 2002 from David R. Zimmerman, Staff Environmental Engineer for Phillip Morris USA, also indicated that the site was no longer active and had been cleaned out (Attachment 3).

According the RCRA Info Handler Information Report (Attachment 1), the site was located at 4460 112th Street. We arrived at the site, which was a storage warehouse, on the morning of June 20, 2002 at approximately 9:30 a.m. We immediately noted that there was no activity outside of the warehouse. We contacted R & R Investors, LTD to obtain documentation that Phillip Morris was no longer leasing the site and to gain access to the site to verify that all potentially hazardous materials had been removed.

We were informed by the receptionist that Phillip Morris USA had also leased an office space in close proximity to the address listed on the RCRA Info Handler Information Report. We presumed that this office handled the warehouse and shipping administrative components. We visited the site of the office and found no evidence of current activity. The door was locked, lights were off, and no office equipment could be seen. The office appeared to have been vacated.

Mr. Pat Burk, counsel for R & R Investors, contacted us via telephone shortly thereafter. He verified that the warehouse was vacant. Mr. Burk was aware that the site was formerly leased to Centrobe, Inc. He stated that R & R Investors had recently acquired the property and did not have a copy of the old lease. He also stated that R & R Investors had no prior documentation of Phillip Morris USA / Centrobe, Inc. at 4460 112th Street, and that R & R Investors did not have the authority to access the site. Mr. Burk was able to verify that the warehouse storage formerly used was in the business complex now occupied by United Information Services (UIS).

We visited with Mr. Richard Barta, Vice President of UIS. He informed us that, toward the end of 2001, several truckloads of material were removed from the warehouse formerly leased by Centrobe, Inc. (located toward the rear of the UIS building). He also stated that he had not seen any trucks there recently. Mr. Barta explained that UIS had been offered all of the available warehouse space in the former Centrobe, Inc. part of the building. He said that UIS had claimed 50,000 square feet of the available 150,000 square feet. He believed the remaining 100,000 square feet of space was vacant.

Mr. Barta showed us the warehouse space recently acquired by UIS. This 50,000 square feet was being used by UIS to store its product (paper goods). No evidence of RCRA-regulated materials

was noted. UIS had erected a divider wall between their storage area and the reportedly vacant section of the warehouse.

With Mr. Barta's permission, we traveled to the rear of the UIS building to look in the windows of the remaining 100,000 square feet. We observed pieces of storage shelving and other miscellaneous parts. It appeared that the site was no longer active. No evidence of RCRA-regulated materials was noted. The planned inspection of this site was terminated.

SUMMARY

It appeared that the site had been vacated, as indicated by the documentation in the EPA files. Therefore, the RCRA inspection was not performed. The CEI checklists and other associated inspection forms, except the RCRA Info Handler Information Report, were discarded.



S. Bret Kendrick
Lead Inspector

Date: July 16, 2002

ATTACHMENTS

- Attachment 1: Copy of the RCRA Info Data Verification Handler Information Report
- Attachment 2: Copy of 2001 EPA Notification of Regulated Waste Activity (4 pages)
- Attachment 3: Copy of October 16, 2001 letter from David R. Zimmerman to EPA

Attachment 1

Copy of the RCRA Info Data Verification Handler Information Report

NDLER INFORMATION REPORT

September 26, 2001

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Identification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP
901 N 5th Street
KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call (913) 551-7126.

EPA RCRA ID Number: IAR000006858

Name of Company/Installation: PHILIP MORRIS USA C/O CENTROBE INC
Location of Installation: 4460 112TH ST S
City/State/Zip: URBANDALE, IA 50322
County: POLK

Mailing Address: PO BOX 26603
City/State/Zip: RICHMOND, VA 23261

Installation Contact: DAVID R. ZIMMERMAN
Job Title: ENVIRON ENGR
Phone Number: (804)274-4803
Contact's Address: PO BOX 26603
City/State/Zip: RICHMOND, VA 23261

Current Owner of Installation: R AND R INVESTORS, LTD
Owner's Address: 1280 OFFICE PLAZA DR
City/State/Zip: WEST DES MOINES, IA 50266
Phone Number: (515)223-4901
Owner Type: Private

Land Type: Private

TYPE(S) OF REGULATED ACTIVITY: LARGE QUANTITY GENERATOR

Hazardous Wastes Handled: D001

E 05/18/99 2 N 02/22/00 1

John Dier for S. Bret Kendrick
SIGNATURE

Lead Inspector
NAME & OFFICIAL TITLE

185102
DATE SIGNED

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.

Attachment 1 Page 1 of 1

Attachment 2

Copy of 2001 EPA Notification of Regulated Waste Activity

Please refer to Section V. Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)			
<input type="checkbox"/> A. Initial Notification	<input checked="" type="checkbox"/> B. Subsequent Notification (Complete item C)	C. Installation's EPA ID Number	
		IAR 000 006 858	
II. Name of Installation (Include company and specific site name)			
Philip Morris USA c/o Centrobe Inc.			
III. Location of Installation (Physical address not P.O. Box or Route Number)			
Street			
4460 112 th Street			
Street (Continued)			
City or Town		State	Zip Code
Urbandale		IA	50322 —
County Code	County Name		
	POLK		
IV. Installation Mailing Address (See instructions)			
Street or P.O. Box			
City or Town		State	Zip Code
			—
V. Installation Contact (Person to be contacted regarding waste activities at site)			
Name (Last)		(First)	
Job Title		Phone Number (Area Code and Number)	
VI. Installation Contact Address (See instructions)			
A. Contract Address Location Mailing		B. Street or P.O. Box	
<input type="checkbox"/> <input type="checkbox"/>			
City or Town		State	Zip Code
			—
VII. Ownership (See instructions)			
A. Name of Installation's Legal Owner			
R and R Investors, LTD			
Street, P.O. Box, or Route Number			
1280 Office Plaza Drive			
City or Town		State	Zip Code
West Des Moines		IA	50266 —
Phone Number (Area Code and Number)		B. Land Type	C. Owner Type
515-223-4901		<input type="checkbox"/> P <input type="checkbox"/> I	<input type="checkbox"/> P <input type="checkbox"/> I
		D. Change of Owner Indicator	Date Changed
		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Month Day Year
			10 15 2001



R00184360
RCRA RECORDS CENTER

Please print or type with ELITE type (12 charac per inch) in the unshaded areas only

Please refer to Section V. Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒
B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number

IAR 000 006 858

II. Name of Installation (Include company and specific site name)

Philip Morris USA c/o Centrobe Inc.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

4460 112 th Street

Street (Continued)

City or Town

Urbandale

State

IA

Zip Code

50322

County Code

County Name

POLK

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

Job Title

Phone Number (Area Code and Number)

VI. Installation Contact Address (See instructions)
A. Contract Address
Location Mailing

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

R and R Investors, LTD

Street, P.O. Box, or Route Number

1280 Office Plaza Drive

City or Town

State

IA

Zip Code

50266

Phone Number (Area Code and Number)

515-223-4901

B. Land Type

P
P

C. Owner Type

P

D. Change of Owner
Indicator

Yes

X

No

Date Changed
Month Day Year

Month

10

Day

15

Year

2001

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to instructions)

A. Hazardous Waste Activities

1. Generator (See instructions)
☐ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
- Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify
- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
- ☐ 4. Exempt Boiler and/or Industrial Furnace
☐ a. Smelting, Melting, and Refining Furnace Exemption
☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Processor
☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- ☐
- Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic ☐

1	2	3	4
---	---	---	---

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
---	---	---	---	---	---

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

Manager, Env. Regulations & Permits
Brian C. Kiernan

10/15/01

XI. Comments

Philip Morris Vacated and Closed the operations - effective 10/15/01

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)

Please print or type with ELITE type (12 character per inch) in the unshaded areas only

ID - For Official Use Only

IX. Description of Hazardous Wastes (Continued; Additional Sheet)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; Use this page only if you need to list more than 12 waste codes.)

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
49	50	51	52	53	54
55	56	57	58	59	60
61	62	63	64	65	66
67	68	69	70	71	72
73	74	75	76	77	78
79	80	81	82	83	84
85	86	87	88	89	90
91	92	93	94	95	96

B. Toxicity Characteristic Hazardous Wastes. (See 40 CFR 261.24; Use this page only if you need to list more than 4 waste codes.)

5	6	7	8	9	10
11	12	13	14	15	16
17	18	19	20	21	22

Attachment 3

Copy of October 16, 2001 letter from David R. Zimmerman to EPA

REC'D
OCT 23 2001
RESP



PHILIP MORRIS

U.S.A.

P. O. BOX 26603, RICHMOND, VIRGINIA 23261 TELEPHONE (804) 274-2000

October 16, 2001

Mr. Pierce Cox
Environmental Protection Agency
Region 7
ARTD\RESP
901 N. 5th Street
Kansas City, KS 66101

Subject: Final Notification of Regulated Waste Activity

Dear Mr. Cox:

Please find enclosed a Final Notification of Regulated Waste Activity for the Philip Morris U. S. A. c/o Centrobe, Inc. physically located in Polk County at 4460 112th Street, Urbandale, IA 50322.

Philip Morris has had all of the promotional sales items managed by Centrobe Inc. removed from the site. The location was cleaned and left vacant.

Therefore, the associated activities and status of the EPA Identification Number should be considered closed, vacant, and the identification number deactivated.

Should you have any questions, I can be reached at 804-274-4803.

Sincerely,

David R. Zimmerman
Staff Environmental Engineer

Enclosure: Final Notification of Regulated Waste Activity

Attachment 4

DOCUMENT CONTROL CHECK SHEET

Media:

Air	RCRA	Water	Other specify
	<input checked="" type="checkbox"/>		

Activity Number: _____

State:

Facility/Site Name and Location: Phillip Morris USA c/o Centrobe, Inc.

IA	KS	MO	NE
<input checked="" type="checkbox"/>			

Urbandale, IA 50322

The following documents pertaining to this activity are contained in this package:

<u>Document</u>		<u>Yes</u>	<u>No</u>	<u>NA</u>
Final Report w/attachments	<u>129</u> ^{to} Pages	(<input checked="" type="checkbox"/>)	()	()
Field Sheets (<u>EPA checklists & worksheets</u>)	<u>0</u> Pages	(<input checked="" type="checkbox"/>)	()	()
Chain-of-Custody Records	_____ Pages	()	()	(<input checked="" type="checkbox"/>)
Field Notes	_____ Pages	()	()	(<input checked="" type="checkbox"/>)
Analytical Data Sheets	_____ Pages	()	()	(<input checked="" type="checkbox"/>)
Photographic Negatives (<u>Digital photo CD</u>) ^{to} <u>10</u> (<u>none</u>)	<u>10</u> (<u>none</u>)	(<input checked="" type="checkbox"/>)	()	(<input checked="" type="checkbox"/>)
Photographs (not included w/report)	_____	()	()	(<input checked="" type="checkbox"/>)
Preinspection Packet	_____ Pages	()	()	(<input checked="" type="checkbox"/>)
Other Documents (list below)		()	()	(<input checked="" type="checkbox"/>)
_____	_____ Pages			
_____	_____ Pages			
_____	_____ Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

John D. Lee for S. Bret Kendrick
Activity Leader's Signature

16 JUL 2002
Date Signed